

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:	PROMESA
THE FINANCIAL OVERSIGHT AND	Title III
MANAGEMENT BOARD FOR PUERTO RICO,	No. 17 BK 3283-LTS
as representative of	(Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, <i>et</i>	
<i>al.</i> ,	
Debtors. ¹	

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**JOINT STATUS REPORT OF MOVANTS AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO, AMERICAN FEDERATION OF
TEACHERS, AFL-CIO, INTERNATIONAL UNION, UNITED AUTOMOBILE,
AEROSPACE AND AGRICULTURAL IMPLEMENT WORKERS OF AMERICA, AFL-
CIO (UAW), AND SERVICE EMPLOYEES INTERNATIONAL UNION AND
RESPONDENTS FEDERAL OVERSIGHT AND MANAGEMENT BOARD FOR
PUERTO RICO AND PUERTO RICO FISCAL AGENCY AND FINANCIAL
ADVISORY AUTHORITY WITH RESPECT TO THE JOINT MOTION FOR ENTRY
OF AN ORDER AUTHORIZING DISCOVERY UNDER BANKRUPTCY RULE 2004**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States Magistrate Judge Judith Gail Dein:

Movants American Federation of State, County and Municipal Employees International Union, AFL-CIO (AFSCME), American Federation of Teachers, AFL-CIO (AFT), International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, AFL-CIO (UAW), and Service Employees International Union (SEIU), on behalf of themselves, their local affiliates in Puerto Rico and their members (collectively, the “Unions”), and the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Oversight Board as the Commonwealth’s representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”),¹ and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and together with the Oversight Board and the Commonwealth, the “Respondents”),² respectfully submit this joint status report in response to the Court’s March 19, 2018 Order Related to the Unions’ Joint Motion for an Order Authorizing Discovery Under Bankruptcy Rule 2004 (the “March 19 Order”) [ECF No. 2768]. The March 19 Order requests that the Parties meet and confer regarding a revised hearing date and proposed briefing schedule in connection with the Unions’ Joint Motion for an Order Authorizing Discovery Under Bankruptcy Rule 2004 (the “Motion”).

Pursuant to the March 19 Order, the Parties report as follows:

1. Hearing Date – The Parties are available to present argument in connection with the Motion on April 19, 2018 in Boston, Massachusetts.
2. Meet and Confer – The Parties are currently scheduled to meet on Friday, March 23, 2018 in Puerto Rico to discuss certain items of concern to the Unions. The Parties intend to address the discovery requests and topics set forth in the Motion.

¹ PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

² The Movants and Respondents are collectively referred to as the “Parties.”

3. Briefing Schedule – In the event the Parties cannot resolve or come to an agreement in regard to the Motion, the Parties shall supplement this status report by no later than March 28, 2018 to include a proposed briefing schedule.

Dated: March 22, 2018

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